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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
DEC 12 2017
BRAN F. McAVOY, CLERK
YAKIMA, WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

MELISA ANN JOE (a/k/a Lisa Ann Joe),
Defendant.

1:17-CR-2059-SMJ

INDICTMENT

Ct. 1: 42 U.S.C. § 1383a(a)(4) –
Misuse of SSI Benefits

Ct. 2: 18 U.S.C. § 641 – Theft of
Government Funds

Ct. 3 and 4: 18 U.S.C. § 1001 – False
Statement

18 U.S.C. § 981(a)(1)(C) and 28
U.S.C. § 2461(c)
Forfeiture Allegations

The Grand Jury charges:

COUNT ONE

Beginning on or about May 1, 2013, and continuing until on or about July 1, 2016,
in the Eastern District of Washington, the Defendant, MELISA ANN JOE (a/k/a Lisa
Ann Joe), in a matter within the jurisdiction of the Social Security Administration, having
made application to receive Supplemental Security Income Benefits payments as
Representative Payee for the use and benefit of M.K.J. and having received such benefits

INDICTMENT

1 payments, knowingly and willfully converted the benefits payments for her own use
2 rather than for the use and benefit of M.K.J. By such action, Defendant, MELISA ANN
3 JOE a/k/a Lisa Ann Joe, stole approximately \$13,296 in Supplemental Security Income
4 Benefits payments to which she knew that she was not entitled, all in violation of 42
5 U.S.C. § 1383a(a)(4).
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8 COUNT TWO

9 Beginning on or about May 1, 2013, and continuing until on or about July 1, 2016,
10 in the Eastern District of Washington, the Defendant, MELISA ANN JOE (a/k/a Lisa
11 Ann Joe), did knowingly convert to her own use money of the Social Security
12 Administration, an agency of the United States, namely, Social Security Supplemental
13 Security Income Benefits payments paid to her as Representative Payee for M.K.J., to
14 which she knew that she was not entitled, having a value of approximately \$13,296, all
15 in violation of 18 U.S.C. § 641.
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19 COUNT THREE

20 On or about September 14, 2015, in the Eastern District of Washington, the
21 Defendant, MELISA ANN JOE (a/k/a Lisa Ann Joe), in a matter within the jurisdiction
22 of the Executive Branch of the Government of the United States, knowingly and willfully
23 made a materially false, fictitious, and fraudulent statement and representation by falsely
24 claiming to have care or custody of M.K.J. in an Application for Child's Insurance
25 Benefits with the Social Security Administration, all in violation of 18 U.S.C. § 1001.
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COUNT FOUR

On or about October 27, 2015, in the Eastern District of Washington, the Defendant, MELISA ANN JOE (a/k/a Lisa Ann Joe), in a matter within the jurisdiction of the Executive Branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation by falsely claiming on a Representative Payee Report to have used M.K.J.'s Social Security Income benefits for the care and support of M.K.J., all in violation of 18 U.S.C. § 1001.

NOTICE OF FORFEITURE ALLEGATIONS

1. The allegations contained in this Indictment are hereby re-alleged and incorporated herein by this reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of an offense(s) in violation of 18 U.S.C. § 641 Theft of Government Funds as alleged in Count 2, Defendant MELISA ANN JOE (a/k/a Lisa Ann Joe), shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense(s), all pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). The property sought for forfeiture includes, but is not limited to, the following:

MONEY JUDGMENT

A sum of money equal to \$13,296.00 in United States currency, representing the amount of proceeds obtained from the theft of government property violation.

1 If any of the property described above, as the result of any act or omission of
2 Defendant:

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4 (a) cannot be located upon the exercise of due diligence;
5 (b) has been transferred or sold to, or deposited with, a third party;
6 (c) has been placed beyond the jurisdiction of the court;
7 (d) has been substantially diminished in value; or
8 (e) has been commingled with other property which cannot be divided without
9 difficulty,

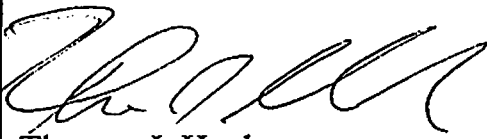
10 the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C.
11 § 853(p), as incorporated by 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).
12

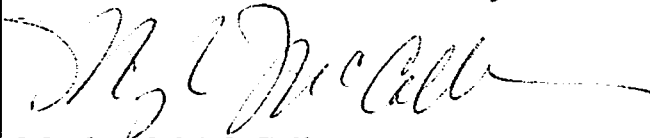
13 DATED this 12th day of December, 2017.

14 A TRUE BILL

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17 Presiding Juror

18 JOSEPH H. HARRINGTON
19 Acting United States Attorney

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21 Thomas J. Hanlon
22 Assistant United States Attorney

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24 Meghan M. McCalla
25 Assistant United States Attorney
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